

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

19 CR 188 (KAM)

FRANK SEGUI,

Defendant.

- - - - - X

JOINT VOIR DIRE REQUESTS AND  
LIST OF NAMES AND PLACES

In accordance with Rule 24(a) of the Federal Rules of Criminal Procedure, the parties respectfully request that the Court include the following case-specific questions in its voir dire of prospective jurors in addition to the Court's standard questions. Where a prospective juror answers in the affirmative, the parties further request that the Court ask additional questions of the prospective juror to determine whether the juror can be fair and impartial in this case. The parties also submit a brief summary of the case, as well as a list of potential witnesses, individuals, and locations that may be mentioned at trial.

I. Case-Specific Proposed Questions of Prospective Jurors<sup>1</sup>

1. In this case, the defendant is charged with making a threat to cause death or bodily injury via e-mail.

- (a) Have you or anyone close to you ever been the recipient of a threat over the internet, including by e-mail, text message, or social media?

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<sup>1</sup> The parties request the right to propose additional questions and modifications to the description of the case after the Court rules on the pending motions.

- (b) Has your life or the life of a close friend or family member been affected by an online threat?
- (c) If you answered yes to either of these questions, is there anything about your experience that might affect your ability to be a fair and impartial juror in this case?
- (d) Is there anything else about the nature of the charges in this case that would cause you to be unable to follow the Court's instructions regarding the law or to render a fair and impartial verdict?

2. Do you or any family members or close friends have a personal connection to Western Michigan University?<sup>2</sup>

## II. Description of the Case

The defendant is charged with transmitting a threat to cause death or bodily injury via e-mail.

## III. List of Names and Places

### 1. Defense

- (a) Frank Segui (Defendant)
- (b) Kannan Sundaram, Esq. (Defense Counsel)
- (c) Karina Buruca (Paralegal)
- (d) Ping Liu (Legal Intern)

### 2. Prosecution

- (a) Andrew Grubin (Assistant U.S. Attorney)
- (b) Philip Pilmar (Assistant U.S. Attorney)

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<sup>2</sup> The defendant requests the following additional question: "Have you or anyone close to you worked as a professor at any college or university?" The government objects to this question.

(c) Emily Miller (Paralegal Specialist)

(d) FBI Special Agent Kerry Calnan

3. Potential Witnesses and Other Individuals Who May Be Mentioned at Trial

(a) John Doe<sup>3</sup>

(b) Port Authority Detective Thomas Kemble

(c) Port Authority Detective Jack Collins

(d) Dr. Susan Stapleton (Western Michigan University)

(e) Scott Merlo (Western Michigan University)

(f) Vincent Radice (FBI CART)

4. Places

(a) Western Michigan University

(b) Kalamazoo, Michigan

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<sup>3</sup> The government will replace “John Doe” with the name of the victim prior to trial.

#### IV. Conclusion

The parties respectfully request that the Court include the foregoing in its voir dire to the jury. In addition, the parties request the opportunity to submit further requests or to amend those submitted as appropriate.

Dated: Brooklyn, New York  
October 22, 2019

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney  
Eastern District of New York

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